

# **Exhibit 1**



**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

ABC Corporation I et al,

*Plaintiff,*

v.

THE PARTNERSHIPS and  
UNINCORPORATED ASSOCIATIONS  
IDENTIFIED ON SCHEDULE “A”,

*Defendants.*

**CASE NO.** 1:20-cv-04806

**Judge:** Honorable Thomas M. Durkin

**DECLARATION OF XIE RONGQING**

I, Xie Rongqing, declare as follows:

1. I am over eighteen (18) years of age. I make this affidavit based on my own knowledge.
2. I am the owner of the company Dongguan Saibotan Nengyuan Keji (Energy Tech) Co. Ltd.  
 (“Dongguan Saibotan”). Dongguan Saibotan owns and operates the Amazon storefront Gyroor-US.
3. Gyroor-US has complied with the Court's Preliminary Injunction Orders.
4. Gyroor-US has ceased selling the accused product and did not assist anyone in selling the accused product.
5. Gyroor-US did not approve any tag-along merchants.
6. Tag-along sellers of Gyroor Brand products do not need approval.
7. Gyroor-US is not affiliated, in active concert of participation with the sellers identified by Plaintiffs.
8. Gyroor-US does not own or operate [www.gyroorboard.com](http://www.gyroorboard.com).
9. Gyroor-US did not transferred money after the account and assets have been frozen.
10. Amazon.com deducts cost for warehouse storage and product refund directly from the frozen assets.
11. Gyroor-US has not control over deductions by Amazon.com.



I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on: 8/17/2021

By: Xie Rong Qing